\$71,409.85

	Attorneys	' Fee	S	
	Rate		Hours	Total
Laura Lazo		125	3.2	\$ 400.00
Shirley Navarro-Losito		125	16.9	2,112.50
Steven John Moser		500	133.7	66,850.00
	TOTAL	L		\$69,362.50

Costs	
Process Service	\$ 240.00
Filing Fees	402.00
Eiber Translation for Deposition of William Nieto	
Invoice No.23/125006	517.00
Lexitas Invoice No.888832 for Deposition of	
William Nieto	673.35
Payment to IRS form 4506 for Request of copy of	
tax returns from Defendant	215.00
TOTAL COSTS	\$ 2,047.35

TOTAL ATTORNEYS' FEES AND COSTS

Date	User	Duration	Description
6/15/2021	Laura Lazo	0.8	Telephone call from Laura Lazo to Jonathan Barahona
6/16/2021	Laura Lazo	0.3	Telephone call from Laura Lazo to Jonathan Barahona
6/18/2021	Laura Lazo	0.3	Telephone call from Jonathan Barahona to Laura Lazo
6/22/2021	Laura Lazo	0.4	Telephone call from Jonathan Barahona to Laura Lazo
6/23/2021	Laura Lazo	0.2	Telephone call from Hector hernandez to Laura Lazo
6/23/2021	Laura Lazo	0.2	Telephone call from Laura Lazo to Hector Hernandez
6/30/2021	Laura Lazo	0.3	Telephone call from Jonathan Barahona to Laura Lazo
7/16/2021	Laura Lazo	0.2	Mail out Demand letter to employer
7/23/2021	Laura Lazo	0.3	Emailed copy of retainer to Jonathan Barahona
9/8/2021	Laura Lazo	0.2	Telephone call from Jonathan Barahona to Laura Lazo

Laura Lazo 3.2

			Lexis/Google and Corporation Database searches to locate proper corporate
7/16/2021	Steven John Moser	0.5	defendant.
7/16/2021	Steven John Moser	0.5	Review intake packets and prepare demand letter to employer
8/30/2021	Steven John Moser	1	Telephone call with Jonathan Barahona re preparation of complaint
8/30/2021	Steven John Moser	3.5	Prepare complaint
8/30/2021	Steven John Moser	1.5	Prepare damages calculaltions for Jonathan Barahona and Hector Hernandez
9/2/2021	Steven John Moser	0.3	Review Deeds Obtained from SC Clerk
9/27/2021	Steven John Moser	1	Meeting with Clients in Office
9/27/2021	Steven John Moser	1	Revise Complaint
9/27/2021	Steven John Moser	0.2	Prepare consent to join forms for clients
1/27/2022	Steven John Moser	0.6	Complete Discovery Order in FLSA case as directed by the Court and file via ECF
1/27/2022	Steven John Moser	0.3	Telephone call with Glen Ingoglia
1/27/2022	Steven John Moser	0.5	Pacer research regarding experience of Glenn Ingoglia
			Pacer research regarding Ingoglia's claim that J Barahona has history of filing
1/27/2022	Steven John Moser	1	FLSA cases
1/27/2022	Steven John Moser	0.3	Participate in initial conference - order issued
1/27/2022	Steven John Moser	1.5	Revise damage calculations and email to opposing counsel
			Sent Email to opposing counsel reminding of date for exchange of payroll
2/18/2022	Steven John Moser	0.3	information and advising we do not hae payroll records
2/25/2022	Steven John Moser	0.2	Sent Email to Glenn Ingoglia
2/25/2022	Steven John Moser	0.1	Telephone call to Glenn Ingoglia
2/25/2022	Steven John Moser	1	Draft motion to compel/preclude/extend to AYS
			Sent Email to Glenn Ingoglia enclosing letter motion to AYS to be filed by COB on
2/25/2022	Steven John Moser	0.2	2/28/2022
3/1/2022	Steven John Moser	0.1	Telephone call to Glenn Ingoglia
3/1/2022	Steven John Moser	0.1	Telephone call to Glenn Ingoglia
3/1/2022	Steven John Moser	0.1	Telephone call from Glenn Ingoglia
3/1/2022	Steven John Moser	0.2	Telephone call from Glenn Ingoglia
3/1/2022	Steven John Moser	0.5	Revise letter motion to compel
3/1/2022	Steven John Moser	0.5	Revise letter motion to compel following conversation with Glenn Ingoglia

3/1/2022 Steven John Moser	0.1	File letter motion via ECF
3/14/2022 Steven John Moser	0.4	Prepare for discovery conference re Motion to Compel
3/14/2022 Steven John Moser		Appearance at Discovery conference re motion to compel. Motion granted.
3/14/2022 Steven John Moser		Review ECF Bounce and Verify Court Deadlines
3/21/2022 Steven John Moser		Draft/Revise H Hernandez responses to court interrogatories
3/21/2022 Steven John Moser		Draft and revise Barahona Responses to Court Interrogatories
3/27/2022 Steven John Moser		Revise damage calculations to be furnished with responses to court
3/27/2022 Steven John Moser		Reviewl all responses to court interrogatories and email to opposing counsel
0.27,2022 0.000.000.000.000.000	0.0	Sent Email to Glenn Ingoglia with reminder that today is deadline to comply with
4/14/2022 Steven John Moser	0.3	court order to furnish employment records
4/14/2022 Steven John Moser		Review Defendant's Declaration re records
4/14/2022 Steven John Moser	0.3	Emails between counsel re sufficiency of declaration
4/26/2022 Steven John Moser		Sent Email to Glenn with Proposed Supplemental Affidavit
		Sent Email to Glenn Ingoglia with updated damages calculations and request for
4/26/2022 Steven John Moser	0.3	availabillity for M&C
4/26/2022 Steven John Moser	0.7	•
4/26/2022 Steven John Moser		Draft revised declaration for William Nieto
4/28/2022 Steven John Moser		Sent Email to Glenn re supp affidavit and sett meeting
4/29/2022 Steven John Moser		Sent Email to Glenn Ingoglia re initial offer and supplemental affidavit.
5/9/2022 Steven John Moser		Sent Email to Glenn Ingoglia
5/10/2022 Steven John Moser		Sent Email to Glenn Ingoglia re zoom meeting and reqest for affidavit
5/10/2022 Steven John Moser		Create Zoom meeting for M&C between counsel and email to Opp Counsel
5/11/2022 Steven John Moser		Prepare for sett conference with Opposing Counsel
		Meeting with opposing counsel re settlement. Waited on zoom for 1/2 hour.
5/11/2022 Steven John Moser	0.5	Defense counsel no-show; call to cell phone unanswered
5/12/2022 Steven John Moser		Telephone call with opposing counsel
		Review list of mediators. Select 3 and email selection to opposing counsel with
5/13/2022 Steven John Moser	0.5	request for supplemental affidavit.
0.20.2022 0.00.00.00.00.00.00.00	0.0	Draft and file 2nd Motion to Compel Compliance with the Court's 1/27/2022
5/16/2022 Steven John Moser	1.2	discovery order
5/16/2022 Steven John Moser		Draft status report to AYS re sett
5/16/2022 Steven John Moser		Sent Email to Glenn Ingoglia re mediator selection
5/20/2022 Steven John Moser		Review file
5/24/2022 Steven John Moser		Review opposition to Motion to Compel filed by Defs
5/24/2022 Steven John Moser		Review tax returns furnished by Def
5/24/2022 Steven John Moser		Prepare reply to Def's letter to the Court in opp to motion to compel
5/24/2022 Steven John Moser		File reply to Def Letter to the Court opposing motion to compel
6/15/2022 Steven John Moser		Review individual rules of Magistrate Lee Dunst
6/15/2022 Steven John Moser		Sent Email to Glenn Ingoglia re converting 7/19 status conf to sett conf
7/15/2022 Steven John Moser		Review docket and calendar
7/19/2022 Steven John Moser		Prepare for initial conference with Hon. Lee Dunst
7/19/2022 Steven John Moser		Appear at conference before Hon. Lee Dunst (includes travel time)
7/29/2022 Steven John Moser		Sent Email to Glenn Ingoglia re M&C
7/29/2022 Steven John Moser		Sent Email to Glenn Ingoglia re M&C
3,2022 0.0101111110001	0.2	

0/1/2022	Ctovan John Masar	0.0	Dhona call to Clann Ungaglia
	Steven John Moser		Phone call to Glenn Jingoglia
	Steven John Moser		Phone call to Glenn J Ingoglia
	Steven John Moser		Draft and file letter motion to accelerate date for selction of mediator to
	Steven John Moser		Telephone call with Glenn Ingoglia
	Steven John Moser		Review letter of G Ingoglia to court seeking sanctions
	Steven John Moser		Legal research regarding safe harbor provisions of rule 11
	Steven John Moser		Review notes and file
	Steven John Moser		First draft of letter to LGD opposing motion for sanctions
	Steven John Moser		Revise letter in opposition to motion for sanctions and file via ECF
	Steven John Moser		Email from Glenn Ingoglia re Def's mediator selections
	Steven John Moser		Email to G Ingoglia re mediator
	Steven John Moser	0.2	Email to G Ingoglia re selection of mediator
9/1/2022	Steven John Moser	0.2	Email to Patrick McKenna asking for his ability/willingness to mediate
			Review good faith requirements of LR 37.3 and FRCP 37.1 and Fields v.
			Bayerische Motoren Werke Aktiengesellschaft, No. 18-CV-2889 (GRB)(AYS),
9/21/2022	Steven John Moser	1.2	2022 U.S. Dist. LEXIS 55701, at *9 (E.D.N.Y. Mar. 28, 2022)
10/6/2022	Steven John Moser	0.2	Telephone call with Patrick McKenna re mediation
10/7/2022	Steven John Moser	0.2	Telephone call to Patrick McKenna re mediation
10/7/2022	Steven John Moser	0.2	Email with Patrick McKenna and Glenn Ingoglia re mediation
10/7/2022	Steven John Moser	0.2	Email with Patrick McKenna and Glenn Ingoglia re mediation
			Draft proposed joint letter to magistrate seeking extension of time to complete
10/7/2022	Steven John Moser	0.4	mediation to 11/11/2022
			Email proposed joint letter to opp counsel re extension of time to complete
10/7/2022	Steven John Moser	0.2	mediation
			Revise letter to reflect that it is plaintiff's motion for extension with defendant's
10/7/2022	Steven John Moser	0.2	consent
10/7/2022	Steven John Moser	0.2	File letter motion to extend date to complete mediation to 11/11/2022
11/23/2022	Steven John Moser	0.5	Review file and ECF bounces
11/23/2022	Steven John Moser	0.3	Draft proposed status report and email to opposing counsel.
11/28/2022	Steven John Moser	0.5	Telephone status conference with Hon. Lee G. Dunst, USMJ
11/28/2022	Steven John Moser	0.5	Prepare for status conference with LGD
1/23/2023	Steven John Moser		Phone call with Glenn J Ingoglia re depositions
1/23/2023	Steven John Moser	0.2	Email to Glenn Ingoglia re: depositions
2/6/2023	Steven John Moser	0.3	Travel to Deposition of Plaintiffs
2/6/2023	Steven John Moser	3.8	Deposition Preparation: Barahona and Hernandez
2/6/2023	Steven John Moser	4	Depositions of Jonathan Barahona and Hector Hernandez
	Steven John Moser		Post-Deposition Meeting with H. Hernandez and J Barahona
2/6/2023	Steven John Moser		Travel from Depositions of Plaintiffs
	Steven John Moser		Prepare for deposition of Defendant
	Steven John Moser		Travel to Deposition of Defendant
	Steven John Moser		Morning prep for deposition of Defendant
	Steven John Moser		Deposition of Defendant
	Steven John Moser		Travel from Deposition of Defendant
	Steven John Moser		Telephone call with Jonathan Barahona
		0.0	

E /17/2022	Steven John Moser	C 0	Draft ex-parte mediation statement with Exhibits and file via ECF
			·
	Steven John Moser		Phone call with Patrick Michael McKenna
5/24/2023	Steven John Moser	0.6	Prepare for settlement conference with Hon. Dunst
F /0 4 /0000	0	0.5	Attendance at settlement conference with LGD: Includes travel time and meeting
	Steven John Moser		with client prior to conference
	Steven John Moser		Review file to determine end date for discovery
	Steven John Moser		Review emails to locate 11/14/2022 request for certified copies
	Steven John Moser		Prepare 4506 to be executed by Def
	Steven John Moser		Prepare DTF505 to be executed by Nieto
6/23/2023	Steven John Moser	0.3	Email authorizations to Opposing Counsel to obtain tax returns
			Email to Lexitas aksing them to furnish notice of the availability of the transcript
	Steven John Moser		to opposing counsel.
	Steven John Moser		Internet research regarding assets. See notes.
	Steven John Moser		Prepare and file motion to compel production of tax authorizations
	Steven John Moser		Review file to prepare Proposed Joint PTO
	Steven John Moser		Prepare proposed Joint PTO and email to Glenn Ingoglia
9/15/2023	Steven John Moser	2.4	Draft and file motion for sanctions pursuant to FRCP 37
			Review docket and send email to Glenn Ingoglia re no tax authorizations received
10/18/2023	Steven John Moser	0.3	and we need feedback on PTO
10/26/2023	Steven John Moser	0.3	Review and resend pretrial order to opposing counsel to be redlined
			Email to Glenn Ingoglia acknowledging receipt of tax authorization and advising
10/26/2023	Steven John Moser	0.2	that the certified copy of the tax returns remains outstanding.
			Email to Glenn Ingoglia advising that we want certified copies or will object to use
10/27/2023	Steven John Moser	0.3	of taxes at time of trial
11/6/2023	Steven John Moser	0.2	Email to Glenn Ingoglia re PTO
11/7/2023	Steven John Moser	0.2	Email to Glenn Ingoglia re PTO
11/7/2023	Steven John Moser	3.5	Review defendants' porposed changes to PTO and revise
11/7/2023	Steven John Moser	0.2	Telephone call to Glenn Ingoglia re PTO
11/9/2023	Steven John Moser	0.2	Telephone call to Glenn Ingoglia re PTO - left message
			Draft letter motion for sanctions for failure to provide tax returns and participate
11/9/2023	Steven John Moser	3.5	in completion of PTO
11/9/2023	Steven John Moser	0.2	Telephone call from Glenn Ingoglia
11/9/2023	Steven John Moser	0.2	Telephone call from Glenn Ingoglia
11/13/2023	Steven John Moser	0.2	Review order of Judge Dunst denying motion for sanctions w/o prejudice
11/13/2023	Steven John Moser	5.2	Prepare revised PTO with additional exhibits and forward to counsel for
11/16/2023	Steven John Moser	0.2	Email to Glenn Ingoglia re availability for M&C on 11/16 at 2 PM
12/7/2023	Steven John Moser	0.3	Review and revise proposed trial damages model
12/19/2023	Steven John Moser	0.2	Telephone call with Glenn Ingoglia re PTO
12/20/2023	Steven John Moser	0.3	Telephone call with potential trial counsel re PTO
12/20/2023	Steven John Moser	0.2	Email to Glenn Ingoglia asking for his changes to the proposed PTO
12/22/2023	Steven John Moser	0.2	Telephone call to Glenn Ingoglia Cell - left message
12/22/2023	Steven John Moser	0.2	Telephone call to Glenn Ingoglia Office - left messge
			Review file; draft and file letter motion to extend the date to file the Joint PTO to
12/22/2023	Steven John Moser	0.6	Dec 29, 2023

12/26/2023 Steven John Moser 11/6/2024 Steven John Moser 11/6/2024 Steven John Moser 12/16/2024 Steven John Moser 13/16/2024 Steven John Moser 14/16/2024 Steven John Moser 15/16/2024 Steven John Moser 16/16/2024 Steven John Moser 17/16/2024 Steven			
1/16/2024 Steven John Moser 1/19/2024 Steven John Moser 1/	12/26/2023 Steven John Moser	3.5	Prepare proposed revised pretrial order and send to Glenn Ingoglia
1.16/2024 Steven John Moser 1.2 Legal research regarding judicial notice of statutes 1/16/2024 Steven John Moser 1.3 Revise PTO to remove the statutes as Pretrial Exhibits 1/19/2024 Steven John Moser 1.5 Prepare revised PTO and email to opposing counsel. 1/30/2024 Steven John Moser 1.5 Prepare revised PTO and email to opposing counsel. 1/30/2024 Steven John Moser 2/1/2024 Steven John Moser 3/2/1/2024 Steven John Moser 2/8/2024 Steven John Moser 3/2/1/2024	1/16/2024 Steven John Moser	1	Barahona: Prepare for Pretrial Conference
1/16/2024 Steven John Moser 1/19/2024 Steven John Moser 1/30/2024 Steven John Moser 1/30/2024 Steven John Moser 2/1/2024 Steven John Moser 3/28/2024 Steven John Moser 2/1/2024 Steven John Moser 3/28/2024 Steven John Moser 2/28/2024 Steven John Moser 3/28/2024 St	1/16/2024 Steven John Moser	0.5	Participate in Pretrial Conference with LGD
Email to Glenn Ingoglia advising that we consent to the deletion of Trial Exhibits 6- 1/19/2024 Steven John Moser 1.5 Prepare revised PTO and email to opposing counsel. 1/30/2024 Steven John Moser 0.2 File proposed PTO 2/1/2024 Steven John Moser 0.3 Participate in pretrial conference 2/1/2024 Steven John Moser 0.5 Participate in pretrial conference Participate in Conference re Ingoglia's motion to be relieved as counsel. Ingoglia 2/8/2024 Steven John Moser 0.5 relieved. Order to follow via ECF Teleconference with LGD re Def's retention of new counsel. Def's time to retain substitute counsel extended sua sponte to 4/10/2024; motion to strike answer to 3/27/2024 Steven John Moser 0.5 Telephone call with William Nieto - see notes 4/24/2024 Steven John Moser 0.5 File review 5/1/2024 Steven John Moser 0.6 File review 5/1/2024 Steven John Moser 0.7 Review docket order referring default motion to LGD 5/9/2024 Steven John Moser 0.8 Attend telephonic status conference. Status report due by May 24, 2024 5/20/2024 Steven John Moser 0.5 Review docket order referring default motion to LGD 5/9/2024 Steven John Moser 0.5 Review file to prepare settlement offer to Wm Nieto Prepare revised damages calculations and make settlement offer of \$285K via 6/28/2024 Steven John Moser 0.2 Telephone call to WM Nieto. Left message for him to call me back. 8/6/2024 Steven John Moser 0.2 Telephone call to WM Nieto. Left message for him to call me back. 8/6/2024 Steven John Moser 0.2 Telephone call to WM Nieto. Default Judgment against Paradise Prepare damages calculations and Moser Declaration in support of motion for Default Judgment against paradise Prepare damages calculations and Moser Declaration in support of motion for Default Judgment against paradise Prepare damages calculations and Moser Declaration in support of motion for Default Judgment against paradise Prepare damages calculations and Moser Declaration in support of motion for Default Judgment against paradise Prepare damages calculations and Moser Declaration in support of	1/16/2024 Steven John Moser	1.2	Legal research regarding judicial notice of statutes
1/19/2024 Steven John Moser 1.5 Prepare revised PTO and email to opposing counsel. 1/30/2024 Steven John Moser 2/1/2024 Steven John Moser 2/1/2024 Steven John Moser 2/1/2024 Steven John Moser 2/1/2024 Steven John Moser 2/8/2024 Steven John Moser 3/8/2024 Steven John Moser 4/8/2024 Steven John Moser 5/20/2024 Steven John Moser 4/8/2024 Steven John Moser 5/20/2024 Steven John Moser 5/20/2024 Steven John Moser 6/28/2024 Steven John Moser 5/20/2024 Steven John Moser 6/28/2024 Steven John Moser 7/2024 Steven John Moser 7/2024 Steven John Moser 8/2024 Steven John Moser 9/2024 Steven John Moser 1/2024 Steven John Moser 1/2025 Steven John Moser 1/2026 Steven John Moser 1/2027 Steven John Moser 1/2027 Steven John Moser 1/2028 Steven John Moser 1/2029 Steven John Moser 1/2020 Steven John Moser 1	1/16/2024 Steven John Moser	0.3	Revise PTO to remove the statutes as Pretrial Exhibits
1.5 Prepare revised PTO and email to opposing counsel. 1/30/2024 Steven John Moser 2/1/2024 Steven John Moser 2/1/2024 Steven John Moser 2/8/2024 Steven John Moser 3/27/2024 Steven John Moser 4/9/2024 Steven John Moser 4/9/2024 Steven John Moser 4/9/2024 Steven John Moser 5/1/2024 Steven John Moser 5/2/2024 Steven John Moser 0.5 Review file to prepare settlement offer to Wm Nieto Prepare revised damages calculations and make settlement offer of \$285K via email. 8/6/28/2024 Steven John Moser 0.2 Review MOL in support of motion to strike and for default against Paradise Prepare damages calculations and Moser Declaration in support of motion for Default Judgment against paradise Prepare notice of motion and proposed order striking answer and for default Prepare notice of motion and proposed order striking answer and for default Prepare notice of motion and proposed order striking answer and for default Prepare notice of motion and proposed order striking answer and for default Prepare notice of motion and proposed order striking answer and for default Prepare notice of motion and proposed order striking answer and for default Judgment against Paradise.			Email to Glenn Ingoglia advising that we consent to the deletion of Trial Exhibits 6-
1/30/2024 Steven John Moser 2/1/2024 Steven John Moser 2/1/2024 Steven John Moser 2/8/2024 Steven John Moser 3/27/2024 Steven John Moser 3/27/2024 Steven John Moser 3/27/2024 Steven John Moser 3/27/2024 Steven John Moser 4/9/2024 Steven John Moser 4/9/2024 Steven John Moser 4/9/2024 Steven John Moser 5/1/2024 Steven John Moser 5/2/2024 Steven	1/19/2024 Steven John Moser	0.2	14 (the statutes).
2/1/2024 Steven John Moser 2/8/2024 Steven John Moser 2/8/2024 Steven John Moser 2/8/2024 Steven John Moser 3/27/2024 Steven John Moser 4/24/2024 Steven John Moser 4/24/2024 Steven John Moser 5/1/2024 Steven John Moser 5/1/2024 Steven John Moser 5/1/2024 Steven John Moser 5/1/2024 Steven John Moser 5/2/2024 Steven John Moser 0.5 Review docket order referring default motion to LGD 5/2/2024 Steven John Moser 0.5 Review file to prepare settlement offer to Wm Nieto Prepare revised damages calculations and make settlement offer of \$285K via 6/28/2024 Steven John Moser 0.2 Telephone call to WM Nieto. Left message for him to call me back. 8/6/2024 Steven John Moser 0.2 Telephone call to WM Nieto. Left message for him to call me back. 8/6/2024 Steven John Moser 2.8 Continue drafting MOL in support of motion to strike and for default against Paradise Prepare damages calculations and Moser Declaration in support of motion for Default Judgment against paradise Prepare notice of motion and proposed order striking answer and for default Prepare notice of motion and proposed order striking answer and for default Prepare notice of motion and proposed order striking answer and for default 1.2 judgment against Paradise.	1/30/2024 Steven John Moser	1.5	Prepare revised PTO and email to opposing counsel.
2/1/2024 Steven John Moser 2/8/2024 Steven John Moser 0.3 Participate in pretrial conference Participate in Conference re Ingoglia's motion to be relieved as counsel. Ingoglia 2/8/2024 Steven John Moser 1.2 Prepare and file pre-motion letter re Default 5/1/2024 Steven John Moser 1.2 Review file to prepare settlement offer to Wm Nieto 1.3 Review file to prepare settlement offer to Wm Nieto 1.4 Revised John Moser 1.5 Steven John Moser 1.5 Steven John Moser 1.6 Region drafting MOL IsO Motion for Default Judgment against paradise 1.6 Prepare notice of motion and proposed order striking answer and for default 1.2 judgment against Paradise.	1/30/2024 Steven John Moser	0.2	File proposed PTO
Participate in Conference re Ingoglia's motion to be relieved as counsel. Ingoglia 2/8/2024 Steven John Moser Description of the property of the property of the property of the property of motion to strike and for default against Paradise 8/8/2024 Steven John Moser Participate in Conference re Ingoglia's motion to be relieved as counsel. Ingoglia of the prepare and file pre-motion for the prepare default of 5/9/2024 steven John Moser Participate in Conference re Ingoglia's motion to be relieved as counsel. Ingoglia of relieved. Order to follow via ECF Teleconference with LGD re Def's retention of new counsel. Def's time to retain substitute counsel extended sua sponte to 4/10/2024; motion to strike answer to 3/27/2024 Steven John Moser 0.5 Telephone call with William Nieto - see notes Prepare and file pre-motion letter re Default 5/1/2024 Steven John Moser 0.6 File review 0.7 Review docket order referring default motion to LGD Sylvary Steven John Moser 0.8 Review docket order referring default motion to LGD Sylvary Steven John Moser 0.9 Review file to prepare settlement offer to Wm Nieto Prepare revised damages calculations and make settlement offer of \$285K via email. Sylvary Steven John Moser 0.1 Telephone call to WM Nieto. Left message for him to call me back. Review flow of motion for Default Judgment against Paradise Prepare damages calculations and Moser Declaration in support of motion for Default Judgment against paradise Prepare notice of motion and proposed order striking answer and for default judgment against Paradise.	2/1/2024 Steven John Moser	0.4	Prepare for pretrial conference
2/8/2024 Steven John Moser 0.5 relieved. Order to follow via ECF Teleconference with LGD re Def's retention of new counsel. Def's time to retain substitute counsel extended sua sponte to 4/10/2024; motion to strike answer to 3/27/2024 Steven John Moser 0.3 be filed on or before 4/24/2024; final pt conference scheduled for 5/9/2024 4/9/2024 Steven John Moser 0.5 Telephone call with William Nieto - see notes 4/24/2024 Steven John Moser 0.6 File review 5/2/2024 Steven John Moser 0.7 Review docket order referring default motion to LGD 5/9/2024 Steven John Moser 0.8 Review file to prepare settlement offer to Wm Nieto Prepare revised damages calculations and make settlement offer of \$285K via email. 6/28/2024 Steven John Moser 0.2 Telephone call to WM Nieto. Left message for him to call me back. 8/6/2024 Steven John Moser 0.2 Begin drafting MOL in support of motion to strike and for default against Paradise 8/8/2024 Steven John Moser 1.8 default Prepare notice of motion and proposed order striking answer and for default 1.2 judgment against Paradise.	2/1/2024 Steven John Moser	0.3	Participate in pretrial conference
Teleconference with LGD re Def's retention of new counsel. Def's time to retain substitute counsel extended sua sponte to 4/10/2024; motion to strike answer to 3/27/2024 Steven John Moser 0.3 be filed on or before 4/24/2024; final pt conference scheduled for 5/9/2024 4/9/2024 Steven John Moser 2 Prepare and file pre-motion letter re Default 5/1/2024 Steven John Moser 0.6 File review 0.5 Yelephone call with William Nieto - see notes 2 Prepare and file pre-motion letter re Default 5/1/2024 Steven John Moser 0.6 File review 0.7 Review docket order referring default motion to LGD 4.2 Review docket order referring default motion to LGD 5/9/2024 Steven John Moser 0.5 Review file to prepare settlement offer to Wm Nieto Prepare revised damages calculations and make settlement offer of \$285K via 6/28/2024 Steven John Moser 0.2 Telephone call to WM Nieto. Left message for him to call me back. 6/28/2024 Steven John Moser 0.2 Telephone call to WM Nieto. Left message for him to call me back. 6/28/2024 Steven John Moser 0.2 Continue drafting MOL in support of motion to strike and for default against Paradise Prepare damages calculations and Moser Declaration in support of motion for 8/28/2024 Steven John Moser 1.8 default Prepare notice of motion and proposed order striking answer and for default 8/9/2024 Steven John Moser 1.8 default Prepare notice of motion and proposed order striking answer and for default 9/2024 Steven John Moser 1.2 judgment against Paradise.			Participate in Conference re Ingoglia's motion to be relieved as counsel. Ingoglia
substitute counsel extended sua sponte to 4/10/2024; motion to strike answer to 3/27/2024 Steven John Moser 4/9/2024 Steven John Moser 5/12/2024 Steven John Moser 6/12/2024 Steven John Mo	2/8/2024 Steven John Moser	0.5	relieved. Order to follow via ECF
3/27/2024 Steven John Moser 4/9/2024 Steven John Moser 4/24/2024 Steven John Moser 5/1/2024 Steven John Moser 5/2/2024 Steven John Moser 5/2/2024 Steven John Moser 5/2/2024 Steven John Moser 5/9/2024 Steven John Moser 5/9/2024 Steven John Moser 5/9/2024 Steven John Moser 5/9/2024 Steven John Moser 5/2/2024 Steven John Moser 5/2/2024 Steven John Moser 5/2/2024 Steven John Moser 6/28/2024 Steven John Moser			Teleconference with LGD re Def's retention of new counsel. Def's time to retain
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8/8/2024 Steven John Moser 2.8 Continue drafting MOL ISO Motion for Default Judgment against paradise Prepare damages calculations and Moser Declaration in support of motion for 1.8 default Prepare notice of motion and proposed order striking answer and for default 8/9/2024 Steven John Moser 1.2 judgment against Paradise.	6/28/2024 Steven John Moser	0.2	Telephone call to WM Nieto. Left message for him to call me back.
Prepare damages calculations and Moser Declaration in support of motion for 8/8/2024 Steven John Moser 1.8 default Prepare notice of motion and proposed order striking answer and for default 8/9/2024 Steven John Moser 1.2 judgment against Paradise.	8/6/2024 Steven John Moser	4.2	Begin drafting MOL in support of motion to strike and for default against Paradise
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Prepare notice of motion and proposed order striking answer and for default 8/9/2024 Steven John Moser 1.2 judgment against Paradise.			Prepare damages calculations and Moser Declaration in support of motion for
8/9/2024 Steven John Moser 1.2 judgment against Paradise.	8/8/2024 Steven John Moser	1.8	default
			Prepare notice of motion and proposed order striking answer and for default
8/9/2024 Steven John Moser 2 Review and finalize all documents re Motion to Strike and For Default.	8/9/2024 Steven John Moser	1.2	judgment against Paradise.
	8/9/2024 Steven John Moser	2	Review and finalize all documents re Motion to Strike and For Default.

Steven John Moser 133.7

			Revise damage calculations/attorneys' fees and costs for purposes of
3/21/2022	Shirley Navarro-Losito	0.9	compliance with Court interrogs
			Telephone calls to clients Jonatan Barahona and Hector Hernandez to acquire
3/22/2022	Shirley Navarro-Losito	0.2	their information and request their signatures for Rogs.
			Spoke with Hector Hernandez to get his email to send e-signature for Resp To
3/22/2022	Shirley Navarro-Losito	0.1	Rog. He will send me via text
3/23/2022	Shirley Navarro-Losito	0.2	Resent documents to Jonatan and Hector for their signature of their Resp to Rogs
8/4/2022	Shirley Navarro-Losito	0.1	Phone call with Jonatan Barahona, lmt to update him on the case (returning his
8/4/2022	Shirley Navarro-Losito	0.1	Phone call with Jonatan Barahona. he called me back, gave him updates on case

0/20/2022 Chirley Nevers Lesite	0.0	Deview court dealert and calendar deadlines
8/30/2022 Shirley Navarro-Losito		Review court docket and calendar deadlines
9/16/2022 Shirley Navarro-Losito		Reviewed court docket
10/11/2022 Shirley Navarro-Losito		scheduling of mediation with Opposing counsel and Patrick McKenna
10/26/2022 Shirley Navarro-Losito		Client called asking for update on the case
11/30/2022 Shirley Navarro-Losito		Reviewed court docket and updated calendar
1/20/2023 Shirley Navarro-Losito		Furnish payment to mediator and sent over USPS service
1/25/2023 Shirley Navarro-Losito		Scheduled deposition for William Nieto for 2/7 @ 11am
1/27/2023 Shirley Navarro-Losito		Call with Jonatan to schedule Deposition and answer questions
1/27/2023 Shirley Navarro-Losito		Call with Hector to confirm deposition date and answer his questions
1/27/2023 Shirley Navarro-Losito		Calendared depositions, prep time and reminders
2/3/2023 Shirley Navarro-Losito		Call with both clients to update prep time call with SJM
2/6/2023 Shirley Navarro-Losito		Confirmed with Lexitas Deposition of Def
2/6/2023 Shirley Navarro-Losito	0.2	Booked translator with Lexitas for tomorrow's deposition
3/10/2023 Shirley Navarro-Losito	0.4	Email opposing counsel to set up sett conference dates. also reviewed court
3/14/2023 Shirley Navarro-Losito	0.2	Email Glenn to get consent on dates picked for Sett conference
3/14/2023 Shirley Navarro-Losito	0.6	Prepared letter to Judge Dunst and sent to SJM for review and corrections
3/14/2023 Shirley Navarro-Losito	0.2	Filed Letter to Judge Dunst with dates for Sett Conference and Discovery dates
3/21/2023 Shirley Navarro-Losito	0.2	Client called to check on the case
4/4/2023 Shirley Navarro-Losito	0.3	Reviewed Court Docket and updated calendar with new dates
5/10/2023 Shirley Navarro-Losito	0.4	Created Letter to Judge Dunst
5/10/2023 Shirley Navarro-Losito	0.2	Filed letter to Judge Dunst
5/17/2023 Shirley Navarro-Losito	0.2	Phone call with Jonatan Barahona
5/17/2023 Shirley Navarro-Losito	0.2	Phone call with Hector Hernandez
5/18/2023 Shirley Navarro-Losito	0.2	REviewed court docket and updated calendar
		Call Lexitas and tell them to send a notice to Glenn Ingoglia that the transcript is
6/7/2023 Shirley Navarro-Losito	0.3	available
7/13/2023 Shirley Navarro-Losito	0.2	Phone call with Hector Hernandez
		Preparing documents with check to pay for request of copy of tax returns and
8/10/2023 Shirley Navarro-Losito	0.4	send via mail to IRS
9/18/2023 Shirley Navarro-Losito	0.3	REviewing court docket and entries.
		Called and spoke to Hector about his brother-witness to send me his info. Lmt for
9/25/2023 Shirley Navarro-Losito	0.2	Jonathan
9/27/2023 Shirley Navarro-Losito	0.3	Reviewing email/court docket and updating calendar
10/18/2023 Shirley Navarro-Losito	0.2	scanned in documents received by mail- Tax authorization form
-		Mail out authorization for State tax information to NYS tax Department Disclosure
10/18/2023 Shirley Navarro-Losito	0.3	Unit, W.A Harriman Campus. Albany, NY 12227-0870
11/22/2023 Shirley Navarro-Losito		Reviewed court docket and emails. Updated calendar with new deadlines
12/20/2023 Shirley Navarro-Losito		Reviewed Court Docket and emails and updated Case Status
12/26/2023 Shirley Navarro-Losito		Read and reviewed court docket. Updated the calendar
1/17/2024 Shirley Navarro-Losito		Reviewed Court Docket and updated calendar
2/1/2024 Shirley Navarro-Losito		Reviewed Court docket and email from opposing counsel with letter to Judge
2/2/2024 Shirley Navarro-Losito		Reviewed court docket and updated calendar dates
2/6/2024 Shirley Navarro-Losito		Reviewed court docket and read letter from opposing counsel to judge
2/8/2024 Shirley Navarro-Losito		Reviewed Court docket and Updated calendar
	5.2	

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			Reviewed court docket and prepared minute order to be mailed to Defendant.
3/21/2024	Shirley Navarro-Losito	0.3	Also sent it via email.
4/15/2024	Shirley Navarro-Losito	0.3	Prepared and mailed las court order and filed via ECF certificate of svce on DEF
4/16/2024	Shirley Navarro-Losito	0.3	spoke with clients about the plate numbers for the trucks
4/16/2024	Shirley Navarro-Losito	0.2	Call with Jonathan
4/26/2024	Shirley Navarro-Losito	0.2	Saved photos sent by client
4/26/2024	Shirley Navarro-Losito	0.2	spoke with both clients
			Filed via ecf cert of svce by mail. Also prepared the certificate and Mailed to Def
5/2/2024	Shirley Navarro-Losito	0.3	the last order and zoom invitation
5/10/2024	Shirley Navarro-Losito	0.3	Reviewed court docket and prepared cert of svce by mail
5/10/2024	Shirley Navarro-Losito	0.4	Filed cert of svce by mail via ECF and went to Post office to drop off letter
5/16/2024	Shirley Navarro-Losito	0.3	Client Hector called to see status of the case
5/29/2024	Shirley Navarro-Losito	0.3	Called clients to inform them of conference on 5/31 that they must attend via
6/4/2024	Shirley Navarro-Losito	0.3	Reviewed court docket and emailed court order to Defendant Nieto.
6/12/2024	Shirley Navarro-Losito	0.2	Spoke to Hector
			Drafted, prepared and filed letter to judge asking for extension of time on joint
6/13/2024	Shirley Navarro-Losito	0.4	status report
6/14/2024	Shirley Navarro-Losito	0.4	Speaking to Defendant Nieto back and forth, he wants to send us some
6/18/2024	Shirley Navarro-Losito	0.4	Prepared court order and sent to defendant. Did Cert of svce and filed via ECF
6/28/2024	Shirley Navarro-Losito	0.2	Filed Status Report via ECF

Shirley Navarro Losito

16.9